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5 *Attorney for Defendants Aric Gastwirth,
6 Reseller Consultants, Inc., and Ambragold, Inc.*

7 UNITED STATES DISTRICT COURT

8 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

10 UNITED STATES OF AMERICA

11 Case No. 2:23-cv-02812-TLN-SCR

12 Plaintiff,

13 v.
14 CB SURETY, LLC, et al.,
15 Defendants,
16

17 **NOTICE OF UNOPPOSED MOTION
18 AND UNOPPOSED MOTION OF
19 DEFENDANTS ARIC GASTWIRTH,
RESELLER CONSULTANTS, INC., AND
AMBRAGOLD, INC. FOR A
TEMPORARY, FOUR-MONTH STAY**

20 [Memorandum of Points and Authorities,
21 Declaration of Matthew Jacobs, and
22 [Proposed] Order filed concurrently herewith]

23 Hon. Troy L. Nunley

24 Date: December 19, 2024
Time: 2:00 p.m.
Courtroom: 2

25 **TO PLAINTIFF AND ITS ATTORNEY OF RECORD:**

26 NOTICE IS HEREBY GIVEN that on December 19, 2024, at 2:00 p.m., or as soon
27 thereafter as the matter may be heard in Courtroom 2 of the above-titled Court, Defendants Aric
28 Gastwirth, Reseller Consultants, Inc., and Ambragold, Inc. (together, the “Gastwirth Defendants”)

1 move for a temporary, four-month stay of this action as to the Gastwirth Defendants only. Plaintiff
2 United States of America does not oppose this request.

3 This unopposed motion is based on this Notice of Unopposed Motion and Unopposed
4 Motion, the concurrently filed memorandum of points and authorities and declaration of Matthew
5 Jacobs in support thereof, the pleadings and papers on file herein, and such oral and documentary
6 evidence as may be presented at or before the time of hearing.

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8 Dated: November 4, 2024

Respectfully submitted,

9 THE JACOBS LAW FIRM, PC

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By:



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15 Attorney for Defendants Aric Gastwirth,
16 Reseller Consultants, Inc., and
17 Ambragold, Inc.